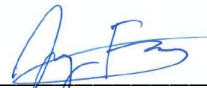


Approved: 

JERRY J. FANG

Assistant United States Attorney

22 MAG 9972

Before: THE HONORABLE VALERIE FIGUEREDO
United States Magistrate Judge
Southern District of New York

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:
UNITED STATES OF AMERICA : COMPLAINT
:
:
-v.- : Violation of
:
ZACHARY BELL, : 18 U.S.C. §§ 111 and
:
: 2119
:
Defendant. : COUNTY OF OFFENSE:
: NEW YORK
:
-----X

SOUTHERN DISTRICT OF NEW YORK, ss.:

CHRISTOPHER HARPER, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI") and charges as follows:

COUNT ONE

(Assault of a Federal Officer)

1. On or about December 9, 2022, in the Southern District of New York, ZACHARY BELL, the defendant, knowingly did forcibly assault, resist, oppose, intimidate, and interfere with a person designated in Section 1114 of Title 18, United States Code, to wit, a Special Agent with the U.S. Drug Enforcement Administration ("Victim-1"), while Victim-1 was engaged in and on account of the performance of official duties.

(Title 18, United States Code, Section 111.)

COUNT TWO

(Attempted Carjacking)

2. On or about December 9, 2022, in the Southern District of New York, ZACHARY BELL, the defendant, knowingly, and with the intent to cause death and serious bodily harm, did attempt to take a motor vehicle that had been transported,

shipped, and received in interstate and foreign commerce from the person and presence of another by force and violence and by intimidation, to wit, BELL attempted to steal a 2019 Jeep Grand Cherokee from the person and presence of another by reaching toward the area of his waistband for a weapon.

(Title 18, United States Code, Section 2119.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

3. I have been involved in the investigation of this matter, and I base this affidavit on that experience, as well as on my conversations with other law enforcement agents, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. Based on my participation in the investigation, my conversations with the law enforcement officers referenced below, body camera footage, surveillance video footage, and my review of arrest reports, I have learned, in substance and in part, the following:

a. On or about December 9, 2022, Victim-1 entered his government-issued 2019 Jeep Grand Cherokee (the "Vehicle")¹ at or near the intersection of 14th Street and 9th Avenue in Manhattan, a few minutes after midnight, to return to his residence after finishing a scheduled shift.²

b. As Victim-1 was stopped in traffic, Victim-1 observed an individual subsequently identified as ZACHARY BELL, the defendant, approach the front driver-side door of the Vehicle and attempt to open the door.

¹ Based on open-source research, I understand the Vehicle to have been manufactured in the state of Michigan.

² Based on my discussions with members of the DEA, I understand that DEA policy is that when an agent is operating an agency vehicle from work to his or her residence, they are considered to be on duty.

c. Victim-1 did not engage with BELL, at which time, BELL walked around the front of the vehicle and began yelling at Victim-1 to "get the fuck out of the car."

d. BELL then returned to the front-driver side door and reached toward the area of his waistband. Based on Victim-1's training and experience as a law enforcement officer, Victim-1 believed BELL to be armed and reaching for a weapon.

e. At that point, in fear for his safety and life, Victim-1 turned on the police lights in the Vehicle, drew his law enforcement firearm, struck BELL in the face, and wrestled BELL to the ground.

f. Victim-1 then handcuffed BELL and dialed 911.

g. When officers from the New York City Police Department ("NYPD") responded, they recovered a black gravity knife from BELL's jacket pocket and a New Jersey driver's license identifying Victim-1's assailant as ZACHARY BELL, the defendant.

WHEREFORE, I respectfully request that ZACHARY BELL, the defendant, be imprisoned or bailed, as the case may be.

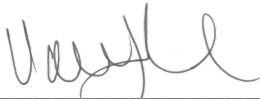
Christopher Harper (by VF with permission)

CHRISTOPHER HARPER

Special Agent

Federal Bureau of Investigation

Sworn to me through the transmission
of this Complaint by reliable electronic
means, this 9 day of December, 2022



THE HONORABLE VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK